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May 13, 2021

**VIA ECF**

Hon. Esther Salas, U.S.D.J.  
United States District Court  
Martin Luther King, Jr. Federal Building  
50 Walnut Street, Room 2060  
Newark, New Jersey 07102

Re:     *Roman v. Union County Jail, et al.*  
Civil Action No. 16-1049 (ES)(JSA)

*Roman v. Johnson*  
Civil Action No. 17-1848 (ES)(JSA)

Dear Judge Salas:

This firm represents Plaintiff Abraham Roman (“Plaintiff”) in the above-captioned cases. We write on behalf of all parties regarding Your Honor’s March 18, 2021 Orders administratively terminating these cases and providing the parties until May 17, 2021 to “file all papers necessary to dismiss [the actions] under Federal Rule of Civil Procedure 41 or, if settlement cannot be consummated, request that the [actions] be reopened.” *See* D.I. 90 in C.A. No. 16-1049; D.I. 44 in C.A. No. 17-1848.

We are pleased to update the Court that, as of a few weeks ago, the parties have formally settled these cases via notarized, written agreements. Plaintiff, however, is currently awaiting payments from the Defendants further to those agreements. While Plaintiff expects to receive the payments in short order, we believe it would be imprudent for Plaintiff to dismiss these cases without having first received the payments. Accordingly, we respectfully request that these cases be reopened for another thirty (30) days, during which time Plaintiff expects to receive the payments and file the appropriate dismissal papers.

If this meets with the Court’s approval, we respectfully request that Your Honor sign and enter the below form of endorsement on both dockets.

Thank you for Your Honor's kind attention to these matters.

Respectfully yours,



Alexander Callo

cc: Hon. Jessica S. Allen, U.S.M.J. (via ECF)  
Counsel for Defendants (via e-mail)  
Charles M. Lizza, Esq. (via e-mail)

SO ORDERED:

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Hon. Esther Salas, U.S.D.J.